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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CALAIS LOUIS LEBLANC, et al.,
Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary,
Department of Homeland Security, *et al.*,
Defendants.

C 4:22-cv-01092 DMR

**STIPULATION TO STAY PROCEEDINGS;
ORDER**

The parties, through their undersigned attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until May 23, 2022. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

Plaintiffs filed this mandamus action seeking adjudication of their Form I-829 Petition by Entrepreneur (hereinafter "Petition") to Remove Conditions on Permanent Resident Status. United States Citizenship and Immigration Services ("USCIS") agrees to work diligently towards completing adjudication of Plaintiffs' petition, absent unforeseen or exceptional circumstances that would require

additional time for adjudication. Regardless, if adjudication is not complete before May 23, 2022, USCIS will provide a status report to the Court.

Accordingly, the parties stipulate and request that the proceedings in this case be stayed until May 23, 2022, at which time the parties will file a joint status report with the Court. At that time, the parties may request a further continuance of the stay of proceedings, dismissal of the litigation if appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this case will benefit the parties and conserve the Court's resources while the parties pursue a potential administrative resolution.ⁱ

Dated: April 5, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/ Elizabeth Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney
Attorneys for Defendants

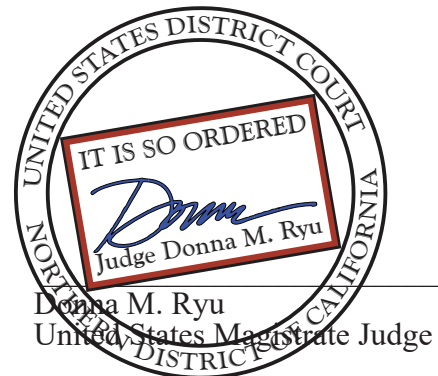
Dated: April 5, 2022

/s/ Paul Chen
Paul Chen
Attorney for Plaintiffs

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: April 8, 2022



ⁱ In accordance with Civil Local Rule 5(i)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.